

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTSFILED
CLERK'S OFFICE

APR 22 2004 P 12 28

CHARLES LANGONE, as FUND MANAGER)	
of the NEW ENGLAND TEAMSTERS AND)	
TRUCKING INDUSTRY PENSION FUND)	
)	
Plaintiff,)	
)	C.A. No. 04cv10317 MEL
v.)	
)	
ATLAS INDUSTRIAL FENCE CO.)	
)	
Defendant,)	
)	

**AFFIDAVIT OF CATHERINE M. CAMPBELL IN SUPPORT
OF AWARD OF ATTORNEY'S FEES AND COSTS PURSUANT TO
SECTION 502(g)(2) OF ERISA, 29 U.S.C. § 1132(g)(2)**

Catherine M. Campbell deposes and says as follows:

1. I am an attorney associated with the law office of Feinberg, Campbell & Zack, P.C., located at 177 Milk Street, Boston, MA 02109. I am admitted to practice before the United States District Court for the District of Massachusetts, the United States District Court for the Northern District of California, the United States Court of Appeals for the First Circuit, the Massachusetts Supreme Judicial Court, and the California Supreme Court. I specialize in litigation under the Employee Retirement Income Security Act of 1974 (ERISA) and the Multiemployer Pension Plan Amendments Act of 1980 (MPPAA). I have acted as legal representative of the New England Teamsters and Trucking Industry Pension Fund ("Pension") for the purposes of the above-captioned matter.

2. The amount of time this office has expended in pursuing collection of pension contributions due and owing the Pension Fund from the Defendant Atlas Industrial Fence

Co. has been 3.0 hours. Pursuant to financial arrangements made by this office with the Fund, services performed by an attorney in this office for the Fund are charged at the rate of \$235.00 per hour for Catherine M. Campbell and \$125.00 per hour for services by a paralegal. Accordingly, the amount of legal fees incurred by the Pension Fund as a result of the work performed by this office is \$622.50. The total amount of costs incurred by the Pension Fund is \$172.79.

3. The total of attorneys fees and costs incurred by the Pension Fund are \$795.29.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 1st DAY OF April 2004.



Catherine M. Campbell

BBO #549397

Feinberg, Campbell & Zack, P.C.

177 Milk Street

Boston, MA 02109

(617) 338-1976

Client	Date	Atty	Cat	Src	H	T	B	R	P	X	C	C	Tcd	Rate	Ctype	Hours	Amount	Ref #	
200.288	01/22/04	7	2	A					1					235.00		1.50	352.50 Create new file; Memo to file; Prepare Demand letter New England Teamsters & Trucking Industry	ARCH	
200.288	01/23/04	11	A	A						54					0	4.65 Certified Mail Cost: Demand letter to company New England Teamsters & Trucking Industry		ARCH	
200.288	02/09/04	7	A	A	A					114					0	150.00 Filing Fees/ (38) Clerk, US District Court New England Teamsters & Trucking Industry		ARCH	
200.288	02/10/04	7	2	A					1					235.00		0.75	176.25 Review of Summons and Complaint; Draft letter to company New England Teamsters & Trucking Industry		ARCH
200.288	02/11/04	7	A	A						54					0	8.84 Certified Mail Cost: Copy of Complaint to United States Secretary of Labor and of the Treasury New England Teamsters & Trucking Industry		ARCH	
200.288	02/18/04	11	A	A						54					0	9.30 Certified Mail Cost: Summons and Complaint to registered agent and president of company New England Teamsters & Trucking Industry		ARCH	
200.288	03/30/04	11	2	P					1					125.00		0.75	93.75 Preparation of Motion For Default Judgment and supporting documents. New England Teamsters & Trucking Industry	3	
Total for Client ID 200.288										Billable Total					3.00		795.29 New England Teamsters & Trucking Industry		
										Billable Total					3.00		795.29 Atlas Industrial Fence Company, Inc.		
Grand Totals										Billable Total					3.00		795.29		
										Billable Total					3.00		795.29		